

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

<hr style="border: 0.5px solid black; margin-bottom: 5px;"/> <i>In re</i> Application of ATIKU ABUBAKAR)	
)	
)	
)	Case No. 23-cv-05099
)	Honorable Nancy L. Maldonado
)	
)	Magistrate Judge Jeffrey T. Gilbert
For an Order Directing Discovery from CHICAGO STATE UNIVERSITY Pursuant to 28 U.S.C. § 1782.)	
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Chicago State, N.Y. TIMES, Nov. 28, 2009, available at <https://www.nytimes.com/2009/11/29/us/29cncstate.html>


4. On or about August 9, 2023, I and Mr. Alexandre de Gramont (counsel for Mr. Abubakar), along with Mr. Michael Hayes (counsel for CSU) by Microsoft Teams video conference and Mr. Chris Carmichael (counsel for Mr. Tinubu) by phone met and conferred regarding objections to the Application, document requests, and deposition topics included in previous versions of the Subpoenas (“Original Subpoenas”). See Exhibits 1 and 2 (Dkts. 1-1, 1-2). Mr. de Gramont asked the parties if they had any objections to the document requests or deposition topics at issue in the Original Subpoenas or ideas on how to potentially narrow the requests. Mr. de Gramont further asked whether counsel for CSU or Mr. Tinubu would be willing to provide a proffer that explains the discrepancies between the two diplomas. On August 17, Mr. de Gramont then emailed to follow up, having not heard anything further. On August 22, the day before they filed their Responses, Mr. Carmichael continued to blanketly object to the Original Subpoenas and Mr. Hayes did not respond. Attached hereto as Exhibit Q is that correspondence.

5. Attached hereto as Exhibit R is a letter from CSU Registrar, Mr. Caleb Westberg, dated June 27, 2022, stating that Mr. Tinubu attended CSU. Mr. Abubakar seeks information from CSU regarding its position on the authenticity of the letter; the reasons that Mr. Westberg (or another CSU representative) prepared the letter; who requested its preparation; and to whom it was provided.

6. On information and belief, the Nigerian Court of Appeals issued a ruling on September 6, 2023, finding in favor of Mr. Tinubu in the Abubakar Proceeding. I have been advised that Mr. Abubakar intends to appeal this decision.

Pursuant to 28 U.S.C. § 1746, I declare, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 6th day of September, 2023



Angela M. Liu